

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA)	
)	
v.)	No. 1:21-cr-41-JL
)	
NOBODY)	
)	

ASSENTED-TO MOTION FOR A PRELIMINARY ORDER OF FORFEITURE

The United States of America moves for a Preliminary Order of Forfeiture for the following reasons:

1. The defendant, Nobody, has pleaded guilty to Count Sixteen of an Indictment that charges him with wire fraud, in violation of 18 U.S.C. § 1343. DN 136.

2. The Indictment contained a Notice of Forfeiture, which stated that, upon conviction, the defendant shall forfeit any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the charged offenses.

Id.

3. On May 18, 2021, the United States filed a Bill of Particulars, listing specific properties that were subject to forfeiture. DN 66. Nobody has agreed to forfeit his interest, if any, in the following properties: (21-FBI-005592) Misc. Goldbacks and (21-FBI-005554) 143 silver coins and one 10-oz silver bar.

4. Pursuant to Rule 32.2(b)(2), the United States respectfully requests that this Court enter a Preliminary Order of Forfeiture, forfeiting to the United States all of the defendant's interest, if any, in: (21-FBI-005592) Misc. Goldbacks and (21-FBI-005554) 143 silver coins and one 10-oz silver bar, pursuant to 18 U.S.C. § 982(a)(2), and ordering the Federal Bureau of

Investigation, or any appropriate federal law enforcement agency, to seize and maintain custody of the forfeited property until further order of the Court.

Patrick Richard, Esq., and Anessa Allen Santos, Esq., counsel for the defendant, Nobody, assent to the relief sought in this motion.

Respectfully Submitted,

JANE E. YOUNG
United States Attorney

Date: July 28, 2022

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